

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	BANKRUPTCY NO. 21-10369-GLT-
	:	
Bonny Lynette Jones,	:	Chief Judge Gregory L. Taddonio
Debtor	:	
	:	
Bonny Lynette Jones,	:	CHAPTER 13
	:	
Movant,	:	RELATED TO CLAIM NO. 3
	:	
v.	:	
	:	
PNC Bank, NA and RONDA J.	:	
WINNECOUR, CHAPTER 13 TRUSTEE,	:	
Respondents.	:	

DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE
FILED IN COMPLIANCE WITH THE LOCAL RULES

I hereby certify as counsel for the Debtor that the existing Chapter 13 Plan is adequately funded and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,

THE QUINN LAW FIRM

BY: /s/ Michael S. Jan Janin
Michael S. Jan Janin, Esquire
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Counsel for Debtor

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Bonny Lynette Jones, : CHAPTER 13
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Movant, : RELATED TO CLAIM NO. 3
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PNC Bank, NA and RONDA J. :
WINNECOUR, CHAPTER 13 TRUSTEE, :
Respondents.

**CERTIFICATE OF SERVICE OF DECLARATION REGARDING
NOTICE OF MORTGAGE PAYMENT CHANGE**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on June 1, 2023.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: Electronic Notification via the CM/ECF System.

- Office of the United States Trustee at ustpreion03.pi.ecf@usdoj.gov
- Chapter 13 Trustee Ronda J. Winnecour at cmecf@chapter13trusteedpa.com
- Brian Nicholas on behalf of Creditor PNC BANK, NA at bnicholas@kmlawgroup.com

EXECUTED ON: June 1, 2023

Respectfully submitted,

THE QUINN LAW FIRM

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